

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF TENNESSEE

**FEMHEALTH USA, INC., d/b/a  
CARAFEM,**

**Plaintiff,**

**v.**

**RICKEY NELSON WILLIAMS, JR.;  
BEVELYN Z. WILLIAMS, JR.;  
EDMEE CHAVANNES; OPERATION  
SAVE AMERICA; JASON STORMS;  
CHESTER GALLAGHER; MATTHEW  
BROCK; COLEMAN BOYD; FRANK  
LINAM; BRENT BUCKLEY; and AJ  
HURLEY;**

**Defendants.**

**Civil Action No. 3:22-cv-00565**

**Judge William L. Campbell, Jr.  
Magistrate Judge Jeffery S. Frensley**

**MOTION FOR ENTRY OF DEFAULT JUDGMENT**

Pursuant to Rule 55(a) of the Federal Rules of Civil Procedure, Plaintiff FemHealth USA, Inc., d/b/a carafem (hereinafter, “carafem”) moves for an entry of default against Defendants Rickey Nelson Williams, Jr., Bevelyn Williams, Edmee Chavannes, and At The Well Ministries (the “Default Defendants”), and requests, pursuant to Federal Rule of Civil Procedure 55(a) and Rule 55.01 of the Local Rules of Court, that the Clerk of Court enter a default in favor of carafem against these Defendants. In support of the motion, carafem states as follows:

1. In support of this motion and in accordance with Local Rule 55.01, Plaintiff carafem has attached the Declaration of Sarah Miller as Exhibit A.
2. Carafem filed its Complaint and Motion for a Temporary Restraining Order on July 29, 2022. (Dkt. Nos. 1–2.) On the same day, the Court issued summonses to Coleman Boyd, Matthew Brock, Brent Buckley, Edmee Chavannes, Chester Gallagher, Aaron J. Hurley, Frank

Linam, Operation Save America National, Inc., Jason Storms, Bevelyn Z. Williams, and Rickey Nelson Williams, Jr. (Dkt. No. 8.)

3. The Court granted the Motion for a Temporary Restraining Order *ex parte* on that same date, and later extended the Temporary Restraining order both on August 2, 2022 and August 12, 2022. (Dkt. Nos. 9, 11, 36.)

4. Summons were returned executed as to Coleman Boyd, Matthew Brock, Brent Buckley, Chester Gallagher, Edmee Chavannes, Frank Linam, Operation Save America, Jason Storms, Aaron J. Hurley, Bevelyn Williams, and Rickey Nelson Williams, Jr. (Dkt. Nos. 25–35, 44–46.)

5. Ms. Chavannes was served with the summons, Complaint, carafem's Complaint and Exhibits (Dkt. No. 1), Motion for a Temporary Restraining Order (Dkt. No. 2), Memorandum in support of a Temporary Restraining Order (Dkt. No. 3), Declaration of Sarah Miller (Dkt. No. 4), Notice of Initial Case Management Conference (Dkt. No. 7), and the Court's Temporary Restraining Order (Dkt. No. 9). (Dkt. No. 29.)

6. Carafem filed an Amended Complaint on August 19, 2022, which added At The Well Ministries, Inc. as a Defendant, (Dkt. No. 38), and served physical copies of the Amended Complaint on the Default Defendants via U.S. Mail.

7. Carafem personally served summons, carafem's Complaint and Exhibits (Dkt. No. 1), Motion for a Temporary Restraining Order (Dkt. No. 2), Memorandum in support of a Temporary Restraining Order (Dkt. No. 3), Declaration of Sarah Miller (Dkt. No. 4), Notice of Initial Case Management Conference (Dkt. No. 7), and the Court's Temporary Restraining Order (Dkt. No. 9), Order Resetting the Hearing (Dkt. No. 11), Order Setting a Status Conference (Dkt. No. 24), Order Cancelling Hearing and Extending the Temporary Restraining Order (Dkt. No.

36), and the Amended Complaint (Dkt. No. 38) on Bevelyn Williams, Rickey Nelson Williams, Jr., and At the Well Ministries on August 26, 2022. (Dkt. Nos. 44–46.)

8. In accordance with Federal Rules of Civil Procedure 12 and 15, Ms. Chavannes had 14 days after service of the Amended Complaint, or until September 2, 2022, to serve an answer or motion in response.

9. In accordance with Federal Rule of Civil Procedure 12, Bevelyn Williams, Rickey Nelson Williams, Jr., and At the Well Ministries had 21 days after service of the Summons and Amended Complaint, or until September 16, 2022, to serve an answer or motion in response.

10. The individual Default Defendants, Bevelyn Williams, Rickey Nelson Williams, Jr., and Edmee Chavannes are not minors or incompetent. (*See* Ex. A at ¶¶ 14–16.) The individual Default Defendants are also not servicemembers in any of the armed forces. (*Id.*) Carafem has attached verification of their lack of military status from the Servicemembers Civil Relief Act website and centralized verification service. (*Id.* at Exs. 3–5.)

11. More than a year has now elapsed since the deadlines to respond to the Amended Complaint. The Default Defendants have failed to file any responsive pleading or participate meaningfully in defense of this action. (*Id.* at ¶¶ 9–12.)

12. The Default Defendants have not filed any responsive pleading or otherwise defended this action within the time period prescribed. Accordingly, Federal Rule of Civil Procedure 55(a) requires the Clerk enter a default against Bevelyn Williams, Rickey Nelson Williams, Jr., Edmee Chavannes, and At the Well Ministries, Inc.

WHEREFORE, Plaintiff carafem respectfully requests that this Motion for Entry of Default be granted, and the Clerk of Court enter a default as to Defendants Rickey Nelson

Williams, Jr., Bevelyn Williams, Edmee Chavannes, and At The Well Ministries, Inc. pursuant to Fed. R. Civ. P. 55(a).

Date: November 17, 2023

Respectfully submitted,

/s/ Sarah B. Miller

Sarah B. Miller

Angela L. Bergman

Allison Wiseman Acker

Briana T. Sprick Schuster

**BASS, BERRY & SIMS PLC**

150 Third Avenue South, Suite 2800

Nashville, TN 37201

(615) 742-6200

(615) 742-6293 (facsimile)

[smiller@bassberry.com](mailto:smiller@bassberry.com)

[abergman@bassberry.com](mailto:abergman@bassberry.com)

[allison.acker@bassberry.com](mailto:allison.acker@bassberry.com)

[briana.sprick.schuster@bassberry.com](mailto:briana.sprick.schuster@bassberry.com)

*Attorneys for Plaintiff*

## **CERTIFICATE OF SERVICE**

I hereby certify that a true and exact copy of the foregoing will be served this 17th day of November, 2023 via Federal Express or U.S. Express Mail on the defendants identified below:

*Via Federal Express*

Edmee Chavannes  
9100 Integra Preserve Ct., #316  
Ooltewah, TN 37363

*Via Federal Express*

Rickey Nelson Williams, Jr.  
5220 Kellogg Creek Trail, Apt. 100,  
Ooltewah, TN 37363

*Via Federal Express*

Bevelyn Z. Williams  
5220 Kellogg Creek Trail, Apt. 100,  
Ooltewah, TN 37363

*Via U.S. Express Mail*

At The Well Ministries  
P.O. Box 633  
Ooltewah, TN 37363

/s/ Sarah B. Miller